

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

JOSEPH DOBIE

Case No. 2:25-mj-00206-KFW

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

1. I, Special Agent Kyle Bishop, depose and make this affidavit in support of a criminal complaint against Joseph Dobie, for violations of Title 18 U.S.C. Sections 1028A (Aggravated Identity Theft), 1035 (False Statements Relating to Health Care Matters), and Title 7 U.S.C. Section 2024(b) (Illegal Acquisition or Use of Supplemental Nutrition Assistance Program Benefits).

2. I am a Special Agent with the U.S. Department of Agriculture - Office of Inspector General ("USDA-OIG"). As such, I am an "investigative or law enforcement officer" within the meaning of 18 U.S.C. § 2510(7) in that I am an officer of the United States who is empowered by law to conduct investigations and to make arrests for federal felony offenses. I also am a "federal law enforcement officer" within the meaning of Rule 41 of the Federal Rules of Criminal Procedure.

3. I have over eleven years of experience as a law enforcement officer. I hold a bachelor's degree in criminal justice and a master's degree in education. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, the Rhode Island Police Academy, and the U.S. Coast Guard Maritime Law Enforcement Academy.

4. As a federal agent, I am authorized to investigate violations of laws of the United States and as a law enforcement officer, I am authorized to execute search warrants and arrest warrants issued under the authority of the United States. I am authorized to conduct and supervise investigations relating to the programs and operations of the USDA; to make arrests, execute warrants, and carry firearms as authorized by the Agriculture and Food Act of 1981 (P.L. 97-98); and to exercise all duties and responsibilities authorized by the Inspector General Act of 1978 or incident thereto, including the authority to obtain USDA records and information, to administer oaths, and to undertake other duties as necessary in support of the mission of the USDA-OIG.

5. This affidavit is based on my personal knowledge, information provided to me by other law enforcement and government personnel, and my review of reports and records used herein. This affidavit is intended to provide the facts necessary for a determination of probable cause for the requested search warrant and criminal complaint. Images used in this affidavit may be cropped or resized for clarity or formatting, however are true and accurate representations of the original image.

BACKGROUND INFORMATION ON SNAP

6. The statements in this section are based on my training and personal experience investigating identity fraud and other federal offenses, and on information provided to me by other federal agents and investigators.

7. Congress enacted the SNAP to “promote the general welfare, to safeguard the health and well-being of the nation’s population by raising levels of nutrition among

low-income households.” 7 U.S.C. § 2011. This program enables low-income households to obtain a more nutritious diet by increasing their food purchasing power.

8. Under the program, eligible households receive food stamps in the form of credits to an electronic benefit card to buy food from retail food stores that participate in SNAP. Food stamp benefits are obligations of the United States and redeemable at face value by the Secretary of Agriculture through the facilities of the Treasury of the United States. 7 U.S.C. § 2024(d). The USDA funds the SNAP nationally. Individuals or families in Maine that need SNAP benefits may apply for assistance through the Maine Department of Health and Human Services (DHHS).

9. It is unlawful to knowingly use, transfer, acquire, alter, or possess SNAP benefits in any manner contrary to Title 7 of U.S. Code or the regulations issued by the USDA. Violations of the section are punishable by a fine of not more than \$250,000 or imprisonment for not more than twenty years. 7 U.S.C. § 2024(b).

10. Maine uses the Electronic Benefit Transfer (“EBT”) system for SNAP benefits. The EBT system uses plastic debit cards, which are automatically credited with the recipient’s allocated value of benefits during certain times of each month. To access benefits, the recipient presents the card at an authorized retail location. The card is swiped through an electronic terminal device (commonly and hereinafter referred to as an “EBT terminal”) which reads coded information on the card’s magnetic strip. The transaction amount is deducted from the EBT card’s balance and deposited into the retailer’s account.

11. When making a purchase from an authorized vendor, an EBT card user swipes the card through the EBT terminal and enters a personal identification number

(“PIN”) via a PIN pad. The terminal communicates via a financial network through a processing switch with a central database, which maintains recipient account balance information. The central database verifies the amount of benefits available, authorizes the transaction and deducts the purchase amount from the recipient’s available balance. The system also calculates cumulative SNAP sales for each retailer and authorizes electronic payments to the retailer’s bank account.

12. Throughout this investigation, the financial institution contracted in Maine for the SNAP EBT program has been the Electronic Payment Processing and Information Control (EPPIC) system provided by Conduent, Inc. (“Conduent”) which is headquartered in Florham Park, New Jersey. Conduent uses a data center located in Sandy, Utah to house the individual Maine EBT cardholder transaction data, and the daily settlement payments made to retailers in Maine.

13. Retailers must obtain a license from the USDA Food and Nutrition Service (“FNS”) to accept SNAP benefits from eligible recipients as payment for authorized food purchases. Before receiving authorization to participate in SNAP, a retailer is provided with an application to participate in SNAP and a book of federal regulations regarding SNAP. As part of the application filled out by a retailer seeking to participate in SNAP, the retailer is advised of the SNAP regulations, including those prohibiting the retailer from providing cash or ineligible items to recipients in exchange for the recipient’s SNAP benefits.

14. FNS has designated what types of items are eligible for purchase using SNAP benefits and what types of items are ineligible for purchase using SNAP benefits. Typical eligible items include bread/cereal, dairy products, fruits, vegetables, meat,

poultry, fish, etc. Typical ineligible items include gasoline, tobacco products, alcohol, paper products, cleaning products, etc.

15. In Maine, SNAP benefits are administered to recipients by Maine DHHS in accordance with federal requirements. Maine DHHS is responsible for determining SNAP eligibility and authorizing benefits for low-income households (participants) in need. Maine DHHS is staffed by state employees who operate staff offices and facilitate online infrastructure.

16. To qualify for SNAP in Maine, the applicant must be a resident of Maine, meet the financial eligibility requirements, and be a United States citizen or an eligible non-citizen, such as Lawful Permanent Resident (LPR) who has earned, or can be credited with, 40 quarters of work. An applicant for SNAP benefits must also provide proof of their identity, i.e., the applicant must be the person who they claim to be. An applicant must also furnish a Social Security number (“SSN”) or provide proof that the applicant has applied for one.

17. An applicant for SNAP benefits must provide complete and accurate information both at the time of application and on an ongoing basis to properly assess initial and continued eligibility for benefits. The amount of SNAP benefits to which a program participant is entitled is electronically posted to the program participant’s account on a monthly basis. Applicant eligibility is determined by citizenship, income, and number of people living within a household. A SNAP household is defined as persons who live together and purchase and prepare meals together.

18. Monthly benefits for SNAP are primarily determined by household size (number of persons living in a household). In the continental United States during

Fiscal Year 2024, households typically receive between \$291 for a household of one person up to \$1,751 for a household of eight persons. SNAP recipients can query the balance of funds on an EBT card by placing a telephone call to a toll-free number maintained by the institution providing the card. The telephone numbers calling the toll-free number are logged.

BACKGROUND INFORMATION ON MEDICAID

19. The Medicaid Program is a joint federal-state program that provides health coverage to certain categories of people, including eligible low-income adults, children, pregnant women, elderly adults, and people with disabilities. Medicaid is administered by the states, according to federal requirements, and is funded jointly by states and the federal government. MaineCare is the Medicaid Program in Maine and is administered by Maine DHHS.

PROBABLE CAUSE **Origin of Investigation**

20. In January 2025, USDA-OIG analyzed SNAP recipient data to detect identities (names, dates of birth, and SSNs) receiving SNAP benefits in multiple states in the month of December 2024. It is unlawful for a recipient to receive SNAP benefits in more than one state in any month. Additionally, the use of an identity to receive SNAP and other government benefits in more than one state simultaneously is an indicator of identity theft.

21. In the month of December 2024, the identity of J.V.S.¹ received SNAP benefits in the State of Maine and the Commonwealth of Puerto Rico simultaneously.

Comparison of Driver's Licenses in J.V.S. Identity

22. I reviewed government records associated with active Puerto Rico and Maine driver's licenses issued to the identity of J.V.S. The Maine and Puerto Rico driver's license records for J.V.S. use the same name, date of birth, and SSN, but the associated photographs for the driver's licenses depict two different persons.

Accordingly, I believe that the Maine and Puerto Rico driver's licenses in the identity of J.V.S. are being used by two different people. I know that no two people share the same name, date of birth, and SSN.

23. As detailed below, I believe DOBIE obtained a Maine driver's license in the identity of J.V.S.² The picture for Maine driver's license in the identity of J.V.S. showing DOBIE as the license holder appears below.



¹ The identity of the presumed victim is represented by the initials of his first and last names. The identity of the victim, J.V.S., is known to the government and is referred to as "the victim" within the affidavit.

² Additional information on the Maine driver's license, including the unredacted name, date of birth, and SSN of J.V.S., is attached as Exhibit A.

24. As detailed below, I believe the true J.V.S. (the victim) is the license holder for Puerto Rico driver's license.³ The picture for Puerto Rico driver's license in the identity of J.V.S. depicts a different person despite using the identical name, date of birth, and SSN as the Maine driver's license. The Social Security Administration (SSA) issued the SSN associated with the identity of J.V.S. at the SSA office in Arecibo, Puerto Rico in 1988.

25. According to SSA records, a replacement Social Security card for the identity of J.V.S. was obtained at the Auburn, Maine SSA office on March 30, 2023 using Massachusetts driver's license in the identity of J.V.S. as proof of identity. The driver's license number recorded by SSA corresponds to the Massachusetts driver's license fraudulently obtained by DOBIE in the identity of J.V.S. During the interaction, the individual who obtained the replacement Social Security card used the address of a homeless shelter at "247 BATES LEWISTON, ME 04240" which is associated with the SNAP and Walmart accounts for DOBIE. Accordingly, I believe DOBIE fraudulently obtained a Social Security card in the identity of J.V.S. from the SSA.

26. Maine Bureau of Motor Vehicle ("BMV") records indicate that DOBIE applied for a Maine driver's license in the identity of J.V.S. at the BMV in Lewiston, Maine on September 25, 2024. DOBIE used a Massachusetts driver's license he obtained in the identity of J.V.S. in support of his application. DOBIE signed the application and affirmed language that stated, "I understand that knowingly supplying

³ Additional information on the Puerto Rico driver's license, including the driver's photo, unredacted name, date of birth, SSN, and driver's license of J.V.S. is attached as Exhibit B. The victim has not yet been interviewed in connection with this investigation.

false information on this form is a Class D crime under Title 17-A, punishable by confinement of up to 364 days or monetary fine of up to \$2000.00 or both.”

27. On September 25, 2024, a Maine voter registration application was submitted in the identity of J.V.S. using DOBIE’s fraudulently obtained Maine driver’s license in the identity of J.V.S. as proof of identity. The application used the same address as used for the fraudulently obtained Maine driver’s license and the fraudulently obtained SNAP benefits. The application was signed by the applicant beneath a certification that stated, “I certify that all information I have provided on this form is true.” A redacted copy of the Maine voter registration submitted using the identity of J.V.S. appears below.

MAINE VOTER REGISTRATION APPLICATION			PARTY AFFILIATION
<p>Federally required questions:</p> <p>* Are you a citizen of the United States of America? * <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO *If NO, DO NOT complete this application.</p> <p>* Are you at least 18 years of age? * <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO **If NO, are you at least 16 years of age to pre-register? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>			
<p>LAST NAME (and suffix, if any)</p> <p>V [REDACTED] S [REDACTED]</p>	<p>FIRST NAME</p> <p>[REDACTED]</p>	<p>MIDDLE NAME</p> <p>[REDACTED]</p>	<p>DATE OF BIRTH</p> <p>[REDACTED] - 1988 MM DD YYYY</p>
<p>CURRENT RESIDENCE ADDRESS (Physical address where you live)</p> <p>STREET NAME AND NUMBER, <u>NOT</u> A P.O. BOX CITY, TOWN, PLANTATION OR TOWNSHIP</p> <p>247 BATES ST LEWISTON</p>			
<p>CURRENT MAILING ADDRESS (Complete if different from above address)</p> <p>STREET NAME AND NUMBER, OR P.O. BOX, etc. CITY/TOWN ZIP CODE</p> <p>247 BATES ST LEWISTON 04240</p>			
<p>Have you previously been registered to vote? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "YES", provide previous registration information below.</p> <p>CITY/TOWN COUNTY STATE</p>			<p>TELEPHONE (Optional)</p>
<p>COMPLETE BOTH SIDES OF THIS CARD - PLEASE PRINT</p>			

MAINE VOTER REGISTRATION APPLICATION - COMPLETE BOTH SIDES OF THIS CARD -		
CHANGE OF NAME (Prior legal name, if applicable) <div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; margin-top: 5px;"> LAST FIRST MIDDLE </div>		VOTER ID: By federal law, NEW Maine voters must provide an applicable ID number as follows: 1. Your <u>Maine driver's license/Maine State ID</u> ; or 2. The last 4 digits of your Social Security number (ONLY if you don't have a <u>Maine driver's license/Maine State ID</u>); or 3. Write "none" ONLY if you don't have either 1 or 2. <div style="border-bottom: 1px solid black; text-align: center; margin-top: 10px;">2102369</div>
SIGN AND DATE THIS CARD. I certify that all the information I have provided on this form is true. <div style="text-align: center; margin-top: 20px;"> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="border-bottom: 1px solid black; width: 300px;"></div> <div style="text-align: center;">09/25/2024</div> </div> <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"> Signature of Applicant on line above Date on line above </div>		
REGISTRAR'S USE ONLY: Date Received: <u>09/26/2024</u> Ward-Precinct: _____ Source of Registration: <input type="checkbox"/> In Person <input type="checkbox"/> By Mail <input type="checkbox"/> Agency <input checked="" type="checkbox"/> BMV <input type="checkbox"/> Voter Registration Drive/3 rd Person Type of Registration: <input checked="" type="checkbox"/> NEW Maine Voter Registration Form of Proof for ID: <u>DRIVER'S LICENSE</u> for Residency: <u>DRIVER'S LICENSE</u> <input type="checkbox"/> Change of Existing Voter Registration (check boxes below) Form of Proof for Residency: _____ <input type="checkbox"/> Address Change to new municipality <input type="checkbox"/> Address Change within municipality <input type="checkbox"/> Party Enrollment Change <input type="checkbox"/> Name Change <input type="checkbox"/> Other Change _____ (If change made) _____		
<div style="text-align: center; margin-top: 10px;"> 100959538 J [redacted] V [redacted] S [redacted] </div>		may prevent registration. on of Elections #184 State House ust be received by the municipal tion, you must register in person copy of your Maine driver's license. at shows your name and address. (rev. 1/24)

Identification of Impostor by Criminal History

28. The U.S. Department of Justice maintains the National Crime Information Center (NCIC) which is a government database of law enforcement information. Within NCIC, the Interstate Identification Index (III) serves as a national catalogue of state and federal criminal history records supported by biometric identifiers. Biometric identification is the automated recognition of individuals through their unique biological characteristics, including fingerprints, which can be used for identification. The fingerprint-supported criminal history of III catalogues criminal bookings for arrests in states and territories of the United States. III uses biometric features to identify an arrestee regardless of a name or names provided at booking by the arrestee and subsequently creates new criminal history or updates an existing criminal history.

29. Based on III records, a person using the identity of J.V.S. has been arrested and fingerprinted in the United States generating a biometrically-supported Universal Control Number (UCN) of 654265RC5.⁴ The names associated with UCN 654265RC5 include both J.V.S. and “Joseph Dobie” (DOBIE) with a date of birth of July 29, 1988. Booking photographs associated with UCN 654265RC5 show DOBIE, as displayed below.⁵



Booking Name: Joseph Dobie
Photo Date: 6/16/2010



Booking Name: Joseph Dobie
Photo Date: 10/20/2020

30. DOBIE has been booked under both the identity of J.V.S. and his true identity, which are both linked to his UCN, with his earliest available criminal booking being an arrest in his true identity (DOBIE). In July 2010, DOBIE was arrested in his

⁴ Based on available law enforcement information, I do not believe the victim has a criminal arrest record and therefore does not appear in III records.

⁵ A “booking photograph” is a photograph taken of a person arrested by law enforcement to document the identity of the arrested person.

true identity for assault and battery on a police officer, resisting arrest, possession of a Class B controlled substance (cocaine), and possession of a Class B controlled substance (cocaine) with the intent to distribute in Worcester, Massachusetts.

31. DOBIE's criminal history includes an arrest using the identity of J.V.S. on January 31, 2019 for criminal possession of a loaded firearm, criminal possession of a firearm with a defaced serial number, criminal possession of a stolen firearm, and criminal possession of a narcotic drug over four ounces in New York, New York.

32. DOBIE's criminal history also includes an arrest in his true identity on November 16, 2020 for assault-related charges and criminal possession of a forged instrument in the second degree in New York, New York. At the time of his arrest, DOBIE possessed a fraudulently obtained Massachusetts driver's license and identification card, both bearing his picture, in the identity of J.V.S.⁶

33. An active New York driver's license exists for DOBIE in his true identity, which was first issued in August 2006 and was renewed most recently in November 2023. DOBIE's New York driver's license picture appears below.



⁶ An unredacted image of the Massachusetts driver's license and identification card in the identity of J.V.S. seized during the arrest is attached as Exhibit C.

34. SSA records indicate that DOBIE was born on July 29, 1988 in Queens, New York to Joseph Dobie, Sr. and Theresa Coles who is now known as Theresa Reed (“Reed”).⁷ The SSA issued DOBIE his assigned SSN at the SSA office in Rego Park, Queens, New York in 1988.

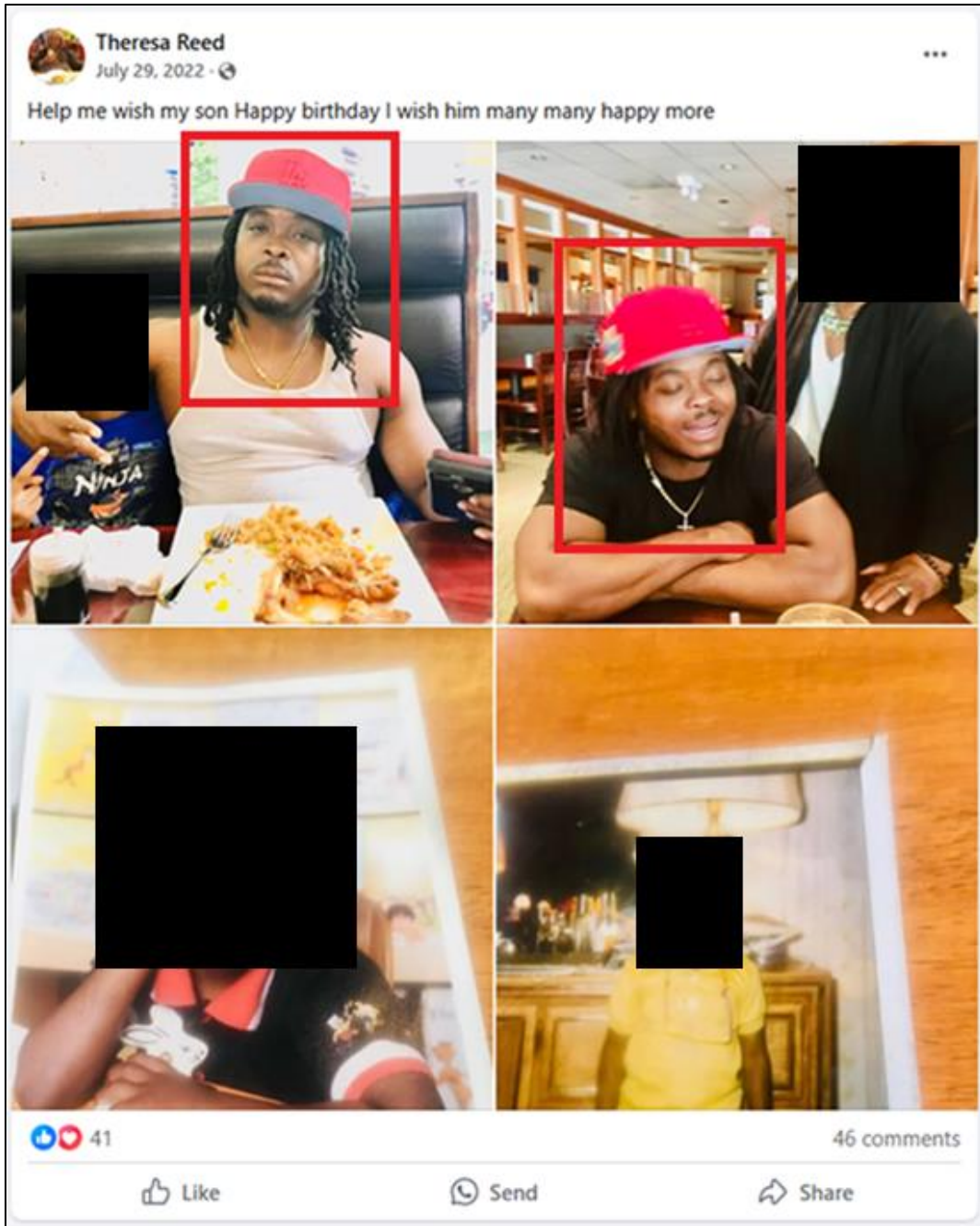
Corroboration of Impostor True Identity via Social Media

35. Facebook is a free social media and social networking internet service owned by the American technology company Meta Platforms, Inc. Any Facebook user with internet access can view publicly accessible content within Facebook.

36. I located a Facebook account for “Theresa Reed,” who I believe is DOBIE’s mother, with a universal resource locator of <https://www.facebook.com/theresa.terry.1291>. Reed, on her Facebook account indicates that she is the mother of “smoe,” “monique,” “cynthia,” “al,” “Shonda,” and “shona” and has a Facebook Friend named “Shona Dobie.” Based on user comments in the below posts, I believe “smoe” is a nickname for DOBIE.

37. On July 29, 2019 (the 31st birthday of DOBIE), the Facebook account posted a picture of Reed and DOBIE with a caption that included the text of “my son joe.” The post showing DOBIE identified with a red rectangle (and other faces redacted), appears below.

⁷According to information obtained through Accurant, Theresa Coles currently uses the name “Theresa Reed” and lives in Corona, Queens, New York. Accurant is a public records database—which has proven reliable in previous investigations—that provides names, dates of birth, addresses, associates, telephone numbers, email addresses, et cetera.



Subject Vehicle

39. According to records maintained by the BMV, a black 2018 Nissan Altima bearing Maine registration plate number 888ADW with vehicle identification number (VIN) 1N4AL3AP8JC470775 ("SUBJECT VEHICLE") is currently registered to J.V.S. I

believe that DOBIE fraudulently registered the SUBJECT VEHICLE using the stolen identity of J.V.S.

40. In August 2023, the SUBJECT VEHICLE was purchased from Peak Automotive, Inc. in Bay Shore, New York by an individual using the identity of J.V.S. and obtained financing from Ally Bank using the identity of J.V.S., according to records from Ally Bank. A Massachusetts driver's license in the identity of J.V.S. issued to DOBIE was submitted in support of the financing application for the SUBJECT VEHICLE.⁸

41. In July 2024, Plymouth Rock Assurance Company received a personal automobile insurance claim for a traffic collision in Queens, New York involving the SUBJECT VEHICLE with an "insured party" of the identity of J.V.S.

42. On many occasions between April, May, and June 2025 and recently on June 6, 2025, the SUBJECT VEHICLE was parked in the driveway at the SUBJECT PREMISES, as documented by a covert surveillance camera. Using the covert surveillance camera, I observed the SUBJECT VEHICLE operated by a subject I believe to be DOBIE drive into the driveway of the SUBJECT PREMISES on multiple dates since March 25, 2025.

Use of Victim Identity in Theft of SNAP Funds

43. On or about March 21, 2023, an online application to Maine DHHS for SNAP and Medicaid benefits was submitted using the identity of J.V.S. via the My

⁸ An unredacted image of the Massachusetts driver's license in the identity of J.V.S. used in the Ally Bank financial records is attached as Exhibit D.

Maine Connection website. The application listed the name, date of birth, and SSN of J.V.S. On April 11, 2025, a birth certificate and Social Security card in the identity of J.V.S. was submitted in support of the SNAP and Medicaid benefit application. The application provided an email address of josevo729@yahoo.com, a telephone number of (347) 870-4583, and a mailing address of “247 Bates St, Lewiston, ME 04240.”

44. On July 18, 2023, an individual purporting to be J.V.S. appeared at the Maine DHHS office in Lewiston, Maine to complete an in-person interview for SNAP and Medicaid benefits. The application used an email address of josevo729@yahoo.com and a mailing address of “247 BATES LEWISTON, ME 04240.” Maine DHHS Eligibility Specialist Marcia Hard completed the interview with the applicant which included the completion and signing of benefit application documents.

45. Based on USDA and Maine DHHS records, at least \$6,114.00 in SNAP benefits was used by the Maine SNAP account in the identity of J.V.S. for the period of August 2023 through present. Between August 2023 and February 2025, the telephone number of (347) 870-4583 conducted over 60 telephone balance inquiries on the EBT card issued to J.V.S.⁹ I obtained records from Walmart Inc. for a customer account used to make transactions using the EBT card in the identity of J.V.S. The Walmart account uses email address of josevo729@yahoo.com, a telephone number of (347) 870-4583, a billing address of “247 BATES LEWISTON, ME 04240, and shipping address of the SUBJECT PREMISES (without apartment number specified). The “Bill Name” for the

⁹ In a prior affidavit in support of a warrant in this investigation (2:25-mj-00181-KFW), I incorrectly stated the last four digits of this telephone number. The correct telephone number appears in this affidavit.

Walmart account is listed variously as “JOSEPH DOBIE” and the full name of J.V.S., among other names.

46. The Maine SNAP application in the identity of J.V.S. indicated that the applicant began receiving New York SNAP benefits in October 2021 in the identity of J.V.S. USDA records reveal that \$9,246.17 in benefits were issued through the New York SNAP account belonging to the individual purporting to be J.V.S. for the period of August 2021 through August 2023. The records further indicate that during the same period, multiple EBT transactions occurred in Maine using the New York SNAP account.

47. DOBIE previously and presently receives SNAP benefits in his true identity issued by the State of New York. Based on USDA records, DOBIE received at least \$11,728.16 in New York SNAP benefits from February 2021 to August 2023 and at least \$3,173.54 from July 2024 to present. Between January and April 2025, SNAP transactions using the New York EBT card issued to DOBIE occurred at online retailers using a delivery address of SUBJECT PREMISES (without apartment number specified).

Use of Victim Identity in Theft of Medicaid Funds

48. According to Maine DHHS records, a MaineCare account exists for the identity of J.V.S. Maine DHHS records indicate that the account associated with the identity of J.V.S. received MaineCare services between approximately April 2023 and March 2025, which were subsequently submitted as claims and reimbursed by the MaineCare program.

49. Maine DHHS records further indicate that, between March 2023 and July 2023, at least two applications for MaineCare benefits were submitted in the identity of

J.V.S. Documents submitted in support of these applications included a Puerto Rico birth certificate and a Social Security card in the identity of J.V.S.

50. The July 2023 application includes attestation language stating: “I certify under penalty of perjury that my answers, including those concerning citizenship or alien status, are correct and complete for all persons applying for benefits...” The attestation is accompanied by the signature of J.V.S., affirming the accuracy of the information provided. It is my belief that Dobie signed the application, including the attestation, to obtain MaineCare and other government benefits through use of the J.V.S. identity.

51. Records pertaining to the individual purporting to be J.V.S were received from a healthcare provider identified through MaineCare records. These records included a Massachusetts driver’s license in the identity of J.V.S. picturing DOBIE that was received by the medical provider on May 7, 2023. On the same date, the provider rendered medical services to the individual, which were subsequently billed to and reimbursed by MaineCare.

52. Since March 2023, MaineCare has paid claims associated with the J.V.S. identity of at least \$10,596.14, according to Maine DHHS.

Maine SNAP Transactions Using Victim Identity

53. On multiple occasions in July, August, November, and December 2024, SNAP EBT transactions using the Maine EBT card issued to DOBIE in the identity of J.V.S. occurred at online retailers using a delivery address of the SUBJECT PREMISES (without apartment number specified).

54. On January 30, 2025, a SNAP transaction using the Maine EBT card issued to DOBIE in the identity of J.V.S. occurred at the 7-Eleven convenience store in Lewiston, Maine, according to Maine DHHS records. Surveillance footage associated with the transaction shows a subject believed to be DOBIE arrive in and depart from the location in a black Nissan sedan I believe to be the SUBJECT VEHICLE. Still images from the surveillance footage showing a subject I believe to be DOBIE and the SUBJECT VEHICLE are displayed below.



55. On February 15, 2025, a SNAP EBT transaction using the Maine EBT card issued to DOBIE in the identity of J.V.S. occurred at the Shaw's supermarket in Lewiston, Maine, according to Maine DHHS records. Surveillance footage associated with the transaction shows a subject believed to be DOBIE, displayed below.



56. On March 11, 2025, a SNAP EBT transaction using the Maine EBT card issued to DOBIE in the identity of J.V.S. occurred at the Dollar General discount store in South Portland, Maine, according to Maine DHHS records. Surveillance footage associated with the transaction shows a subject believed to be DOBIE, displayed below.



57. On April 23, 2025, an online SNAP transaction via the BJ's Wholesale Club website using the Maine EBT card issued to DOBIE in the identity of J.V.S occurred with a delivery address of the SUBJECT PREMISES (without apartment number specified), according to SNAP records.

58. On April 23, 2025, an online SNAP transaction via the Walmart website using the Maine EBT card issued to DOBIE in the identity of J.V.S occurred with a delivery address of the SUBJECT PREMISES (without apartment number specified), according to SNAP records.

59. On April 28, 2025, an online SNAP transaction via the Shaw's supermarket website using the Maine EBT card issued to DOBIE in the identity of J.V.S occurred with a delivery address of the SUBJECT PREMISES (without apartment number specified), according to SNAP records.

Movement of SUBJECT VEHICLE Corresponding to EBT Transactions

60. I reviewed records of automatic license plate reader ("ALPR") data maintained by government agencies in New York and Massachusetts. These records

show the SUBJECT VEHICLE traveled through Massachusetts to New York City on April 18, 2025.

61. Between April 19, 2025 and April 21, 2025, EBT transactions using the Maine EBT card issued to DOBIE in the identity of J.V.S. occurred at retail locations in Corona, Queens, New York. On April 18, 2025, a mobile ALPR documented the SUBJECT VEHICLE parked at an apartment building associated with DOBIE's mother in Corona, Queens, New York approximately 900 feet from the locations at which the SNAP EBT transactions occurred. On April 19, 2025 at 2:19 p.m., a SNAP EBT transaction occurred in Corona, Queens, New York using the EBT card issued to J.V.S. One minute later on April 19, 2025 at 2:20 p.m., a mobile ALPR documented the SUBJECT VEHICLE parked approximately 300 feet from the location at which the SNAP transaction occurred.

62. On April 21, 2025 into the early morning hours of April 22, 2025, ALPR documented the SUBJECT VEHICLE travel north from New York City into Massachusetts.

Tracking Warrant

63. On May 16, 2025, U.S. District Court Magistrate Judge Karen Frink Wolf issued a tracking warrant authorizing federal agents to install and use a tracking device to monitor the location of the SUBJECT VEHICLE. Subsequently, I covertly installed the tracking device on the SUBJECT VEHICLE at the SUBJECT PREMISES and monitored the location of the tracking device, as authorized by the tracking warrant.

64. The tracking device documented the movement of the SUBJECT VEHICLE to residential and commercial locations in and around Lewiston, Maine. The SUBJECT

VEHICLE frequently parked at the SUBJECT PREMISES for significant amounts of time which further supports my belief that DOBIE lives at that location.

Subject Premises

65. Using a covert surveillance camera, I observed DOBIE regularly outside 95 Horton Street, Lewiston, Maine, on many dates in April, May, and June 2025. I observed DOBIE recently at the SUBJECT PREMISES on June 6, 2025.

66. Using a covert surveillance camera, I observed movement of a person at a window within 95 Horton Street, Lewiston, Maine that corresponded to movement of the SUBJECT VEHICLE with further supports my belief that DOBIE resides at the SUBJECT PREMISES which I believe to be Apartment 1 (the first-floor front apartment). The covert surveillance camera documented the front of 95 Horton Street, Lewiston, Maine, as viewable to any member of the public standing on the public sidewalk in front of 95 Horton Street, Lewiston, Maine. The window referenced in this paragraph is located approximately 15 feet from the public sidewalk. On March 26, 2025 at approximately 2:01 a.m., a person peered out of the window on the first floor frontmost (east) part of the building, as displayed below.



67. Approximately one minute later on March 26, 2025 at approximately 2:02 a.m., a person exited the front of the building and entered the SUBJECT VEHICLE, as displayed below.





68. DOBIE typically parks the SUBJECT VEHICLE in the driveway of the 95 Horton Street and enters the front entry door. Based on information obtained by the covert surveillance camera and tracking device, I know that DOBIE, using the SUBJECT VEHICLE, began and ended multiple vehicle trips at 95 Horton Street.

69. According to U.S. Postal Service records, the identity of J.V.S. receives mail at the SUBJECT PREMISES. In March 2025, a parcel was shipped to J.V.S. at “95 Horton St., Apt. 1, Lewiston, ME 04240” (SUBJECT PREMISES). In March 2025, an Amazon package was shipped to J.V.S. at “95 Horton St., Apt. 1, Lewiston, ME 04240-6970” (SUBJECT PREMISES). In April 2025, a letter was mailed to J.V.S. at “95 Horton St., Apt. 1F, Lewiston, ME 04240” (SUBJECT PREMISES).

70. I have reviewed records of obtained from Amazon Inc, which reveal that a customer account exists in the identity of J.V.S. with a delivery address of “95 Horton Street, Apartment 1, Lewiston, Maine 04240-6970.” The records reflect that, over the last year, Amazon shipped dozens of orders to J.V.S. at the SUBJECT PREMISES, including a delivery as recently as March 23, 2025.

71. As stated previously, records for recent online purchases made using SNAP benefits associated with DOBIE show shipments to the SUBJECT PREMISES (without apartment number specified) from online retailers.

CONCLUSION

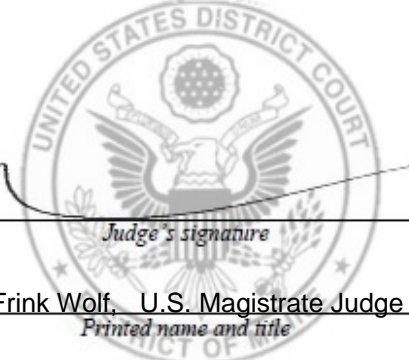
72. I respectfully request that the Court issue a criminal complaint charging Joseph Dobie with violations of Title 18 U.S.C. Sections 1028A (Aggravated Identity Theft), 1035 (False Statements Relating to Health Care Matters), and Title 7 U.S.C. Section 2024(b) (Illegal Acquisition or Use of Supplemental Nutrition Assistance Program Benefits).


Special Agent Kyle Bishop
Office of Inspector General
United States Department of Agriculture

Sworn to telephonically and signed
electronically in accordance with the
requirements of Rule 4.1 of the Federal Rules
of Criminal Procedures

Date: Jun 06 2025

City and state: Portland, Maine


Judge's signature

Karen Frink Wolf, U.S. Magistrate Judge
Printed name and title